

Fletcher, Heald & Hildreth, P.L.C.
1300 North 17th Street, 11th Floor
Arlington, VA 22209
Telephone: 703-812-0400
Facsimile: 703-812-0486

Writer's Direct:

703-812-0430
evans@fhhlaw.com

January 14, 2003

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: Ex Parte Submission
Revision of Part 15 of the Commission's
Rules Regarding Ultra-Wideband Transmission
Systems ET Docket 98-153

Dear Ms. :

The Commission has indicated in the past its considered judgment that Ground Penetrating Radar (GPR) devices are unlikely to cause interference to other communications devices or systems. In an effort to further verify that fact, the GPR Service Providers Coalition recently polled its members to determine whether any GPR user had received a complaint of interference since the Commission formally authorized such operations last summer. It was felt that in the post-July 15 environment where all GPR users are publicly registered, any affected communications user would be more readily able to identify and contact GPR operators who might have been the source of perceived interference. *None* of the 39 members of the Coalition reported any such complaint whatsoever.

In addition, two members reported that they had done extensive GPR testing at six airports in California, Texas and Louisiana. In each case, the tests were conducted at the request of airport authorities or their contractors. In no case was there any report of interference to any communications system. In fact, as reflected in the attachment, the use of GPR technology by Blackhawk GeoVision obviated the need to shut down the airports during construction or runway testing. An additional test of runways at Los Angeles International Airport is scheduled to take place this month to locate underground utilities for runway testing and perform critical runway layer thickness measurements.

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These results confirm once again that GPR devices contribute significantly to public health and safety without negative consequence to other users of the radio environment.

Please contact the undersigned should you require any further particulars about these operations.

Yours truly,

Donald J. Evans
Counsel for the GPR Service Providers Coalition

DJE:deb

cc: Service List

SERVICE LIST

Chairman Michael Powell
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Commissioner Kathleen Q. Abernathy
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Commissioner Michael J. Copps
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Commissioner Kevin J. Martin
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Commissioner Jonathan S. Adelstein
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Bryan Tramont
Office of Commissioner Powell
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Paul Margie
Office of Commissioner Copps
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Sam Feder
Office of Commissioner Martin
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Julius P. Knapp
Deputy Chief, OET
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Bruce A. Franca
Deputy Chief, OET
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Michael J. Marcus
Associate Chief (Technology), OET
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Lisa A. Gaisford
Chief of Staff, OET
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Geraldine A. Matise
Deputy Chief
Policy and Rules Division
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Ira R. Keltz
Deputy Chief
Policy and Rules Division
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Karen E. Rackley
Chief
Technical Rules Branch
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

John A. Reed
Technical Rules Branch
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Ron Chase
Technical Rules Branch
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554